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Attorneys for Comcast Defendants.

(Additional counsel information omitted)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

COMCAST CORPORATION;
COMCAST CABLE
COMMUNICATIONS, LLC; AND
COMCAST CABLE
COMMUNICATIONS MANAGEMENT,
LLC,

Defendants.

**No. 2:23-cv-1049-JWH-KES (Lead
Case)**

**No. 2:23-cv-1050-JWH-KES
(Related Case)**

**No. 2:23-cv-1043-JWH-KES (Lead
Case)**

**No. 2:23-cv-1048-JWH-KES
(Related Case)**

Assigned to Hon. John W. Holcomb

**DECLARATION OF KRISHNAN
PADMANABHAN IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS SECOND AMENDED
COMPLAINT UNDER FED. R.
CIV. P. 12(b)(1) AND 12(b)(6)**

1 I, Krishnan Padmanabhan, hereby declare as follows:

2 1. I am an attorney at law duly licensed to practice in the State of California.
3 I am an attorney with Winston & Strawn LLP and counsel for defendants Comcast
4 Corporation, Comcast Cable Communications, LLC, and Comcast Cable
5 Communications Management, LLC (collectively “Defendants” or “Comcast”). I have
6 knowledge of the following and, if called as a witness, could and would testify
7 competently to the contents of this declaration.

8 2. Attached as **Exhibit A** is a true and correct copy of a cross reference chart
9 comparing the 1043 and 1049 Second Amended Complaint (“SAC”) allegations,
10 prepared by counsel for Comcast.

11 3. Attached as **Exhibit B** is a true and correct copy of a cross reference chart
12 comparing the SAC, “corrected” SAC, and, as applicable, Third Amended Complaint
13 (“TAC”) allegations prepared by counsel for Comcast.

14 4. Attached as **Exhibit C** is a true and correct copy of the assignment of U.S.
15 Patent No. 9,866,438.

16 5. Attached as **Exhibit D** is a true and correct copy of U.S. Patent No. 11,
17 785,275.

18 6. Attached as **Exhibit E** is a true and correct copy of an email sent from
19 Samuel Richey on October 29, 2023.

20 7. Attached as **Exhibit F** is a true and correct copy of an email sent from
21 Raquel Baccus on November 3, 2023.

22 8. Attached as **Exhibit G** is a true and correct copy of the Third Amended
23 Complaint filed in *Core Optical Techs., LLC v. Juniper Networks Inc.*, Case No. 21-cv-
24 02428-SK, 562 F. Supp. 3d 376 (N.D. Cal. 2021).

25 9. Attached as **Exhibit H** is a true and correct copy of an April 27, 2022 New
26 York Times Article cited in the SAC.

27 10. Attached as **Exhibit I** is a true and correct copy of a document produced
28 in connection with this litigation, bates labeled MOCA_1038720-1.

1 11. Attached as **Exhibit J** is a true and correct copy of the MoCA Intellectual
2 Property Rights Policy v1.1 dated December 2003.

3
4 I declare under penalty of perjury under the laws of the United States that the
5 foregoing is true and correct.

6
7 Executed on this 29th day of December, 2023 in New York, NY.

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9 Dated: December 29, 2023

WINSTON & STRAWN LLP

10 By: /s/ Krishnan Padmanabhan
11 Krishnan Padmanabhan
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